

PHILLIP A. TALBERT
United States Attorney
KEVIN C. KHASIGIAN
Assistant U. S. Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700

Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

2021 CADILLAC ESCALADE 600, VIN:
1GYS4BKL6MR219654, LICENSE NUMBER:
8WAE131,

Defendant.

2:23-MC-00227-DJC-CKD

STIPULATION AND ORDER EXTENDING
TIME FOR FILING A COMPLAINT FOR
FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant Karina Vaca ("claimant"), by and through their respective counsel, as follows:

1. On March 15, 2023, claimant filed a claim in the administrative forfeiture proceeding with the Drug Enforcement Administration with respect to the above-referenced vehicle (hereafter "defendant vehicle"), which was seized on December 13, 2022.

2. The Drug Enforcement Administration has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant vehicle under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant vehicle as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

1 forfeiture against the defendant vehicle and/or to obtain an indictment alleging that the defendant vehicle
2 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
3 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
4 That deadline is June 13, 2023.

5 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
6 August 11, 2023, the time in which the United States is required to file a civil complaint for forfeiture
7 against the defendant vehicle and/or to obtain an indictment alleging that the defendant vehicle is subject
8 to forfeiture.

9 5. Accordingly, the parties agree that the deadline by which the United States shall be
10 required to file a complaint for forfeiture against the defendant vehicle and/or to obtain an indictment
11 alleging that the defendant vehicle is subject to forfeiture shall be extended to August 11, 2023.

12 Dated: 6/9/2023

PHILLIP A. TALBERT
United States Attorney

13
14 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

15
16 Dated: 6/9/2023

/s/ Micheal Severo
MICHAEL SEVERO
Attorney for potential claimant
Karina Vaca
The Severo Law Firm
301 North Lake Avenue, Suite 315
Pasadena, CA 91101

(Signature authorized by email)

17
18
19
20
21
22 **IT IS SO ORDERED.**

23
24 Dated: June 13, 2023

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE